

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA,  
PLAINTIFF,

v.

SARAH CAVANAUGH  
DEFENDANT,

:  
:  
:  
:  
:  
:  
:

: CASE NO. 1:22-mj-00017-LDA

**RESPONSE TO THE GOVERNMENTS MOTION TO MODIFY CONDITIONS OF RELEASE**

Comes now, Sarah Cavanaugh, by and through counsel, respectfully moves this Court to consider the US Government's motion to modify the terms of Defendant's release conditions MOOT, in the above-entitled matter. As grounds therefore, Defendant states as follows:

1. Ms. Cavanaugh is presently on pretrial supervision, stemming from her arraignment on March 14, 2022, in which she was charged via criminal complaint with Wire Fraud, in violation of 18 U.S.C. §1343; Aggravated Identity Theft, in violation of 18 U.S.C. §1028A; Forging or Altering Military or Naval Discharge Certificates, in violation of 18 U.S.C. §498; and Fraudulent use of Military Medals or Decorations, in violation of 18 U.S.C. §704(b) and (d)(1).

2. As a condition of Defendant's release, the Court ordered that Defendant "continue or actively seek employment." *ECF* #12, p.2. As the US Government concedes, there were no restrictions placed on the nature of employment in which Defendant could engage.

3. Since Defendant's arraignment on March 14, 2022, she has applied for (and was hired) for positions at local employers including: Dunkin Donuts, Lowes, Petro, One Neighborhood Builders, AIDS Care Ocean State, Northeast Family Services, and Water's Edge, only to be terminated once each of these employers became aware of her pending criminal case. Defendant also had offers rescinded by ARISE Counseling, State of RI (EOHHS) and Calyspo Cards, among others<sup>1</sup>.

4. Despite these humiliating setbacks, Defendant has continued to seek out employment per the conditions of the Court, to provide a living wage for herself, and to save for the restitution amount that is owed to the victims in this pending case. This includes creating a business to offer counseling services.

5. In late June 2022, Defendant filed paperwork with the R.I. Secretary of State forming "Stet Therapeutic Services LLC", an entity that provides counseling services that is accompanied with a website, [www.stettherapeuticservices.com](http://www.stettherapeuticservices.com).<sup>2</sup>

6. On July 25, 2022, Defendant, upon advice of counsel, took down the aforementioned website.<sup>3</sup>

---

<sup>1</sup> Please see exhibit "A"

<sup>2</sup> Please see exhibit "B"

<sup>3</sup> Please see exhibit "C"

7. On July 27, 2022, Defendant signed a Consent Order for Voluntary Surrender, which was provided to the State of Rhode Island, Department of Health (RIDOH), Center for Professional Boards and Licensing. Within the Consent Order, Defendant voluntarily surrendered her Rhode Island Independent Social Worker license indefinitely.<sup>4</sup> RIDOH subsequently accepted Defendant's signed Consent Order, resulting in Defendant agreeing to "immediately cease and desist from representing herself as a licensed Independent Social Worker in the State of Rhode Island, nor engage in the practice of social work in any form, pending further Order of RIDOH". As a result, Defendant is no longer holding herself out or working in any capacity as a "social worker" in the State of Rhode Island.

For these reasons, Ms. Cavanaugh asks that this Court consider the US Government's motion to modify the terms of Defendant's release conditions moot.

SARAH CAVANAUGH,  
By her attorney

*s/Kensley R. Barrett*  
KENSLEY R. BARRETT  
Bar No. 8657  
Marin & Barrett, Inc.  
1000 Chapel View Blvd, Suite 260  
Cranston, Rhode Island 02920  
Phone: (401) 601.8646  
Fax: (401) 679.0122  
E-mail: [kb@marinbarrettlaw.com](mailto:kb@marinbarrettlaw.com)

**CERTIFICATE OF SERVICE**

I, do hereby certify that on July 29, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Ronald Gendron  
Assistant United States Attorney  
50 Kennedy Plaza  
Providence, Rhode Island 02903

Respectfully submitted,

*s/Kensley R. Barrett*  
KENSLEY R. BARRETT  
Bar No. 8657  
Marin & Barrett, Inc.

---

<sup>4</sup> Please see exhibit "D"

1000 Chapel View Blvd, Suite 260  
Cranston, Rhode Island 02920  
Phone: (401) 601.8646  
Fax: (401) 679.0122  
E-mail: [kb@marinbarrettlaw.com](mailto:kb@marinbarrettlaw.com)

# EXHIBIT A



Employment History	Dates Worked (2022)	Date Terminated (2022)
Dunkin Donuts	March 3, 4, 5, 8, 9, 10, 11	March 16, 2022
Lowes	March 23, 24, 25, 26, 27, 28	March 28, 2022
Petro	April 11, 12, 13	April 13, 2022
ONE Neighborhood Builders	April 20, 21, 22, 25, 26	April 26, 2022
AIDS Care Ocean State	May 2, 3, 4, 5, 6, 9, 10, 11, 12, 13	May 13, 2022
Northeast Family Services	May 9, 10, 11, 12, 17, 19, 20, 24, 25, 26, 31 June 1, 2, 6, 7, 8, 9, 10, 13	June 13, 2022
Water's Edge	May 25 June 1, 2, 8, 9, 10	June 11, 2022
Providence Community Health Center	June 27, 28	June 28, 2022
Revive Therapeutic Services	July 12, 13, 14, 15, 19, 20, 21, 22	July 25, 2022
<b>Offers Rescinded</b>		
Calypso Cards	April 1, 2022	
State of RI (EOHHS)	April 15, 2022	
Carmax	April 21, 2022	
ARISE Counseling	May 12, 2022	

# EXHIBIT B



10:36



EDIT



Home  
Page · Published

## Stet Therapeutic Services



People seek therapy for help and support with all sorts of problems, and there's no reason to wait until things feel unmanageable.

At Stet, we take an individualized approach, tailoring treatment to meet the unique needs of each client and are dedicated to helping everyone, no matter

AA  alibut-lp58.squarespace.com 

# EXHIBIT C



## Private Site

This site is currently private. If you're the owner or contributor, log in.

# EXHIBIT D



STATE OF RHODE ISLAND

DEPARTMENT OF HEALTH  
DIVISION OF CUSTOMER SERVICES  
CENTER FOR PROFESSIONAL BOARDS AND LICENSING

IN THE MATTER OF: SARAH CAVANAUGH  
LICENSEE NO.: ISW03048  
COMPLAINT ID #: C22-0506

CONSENT ORDER FOR VOLUNTARY SURRENDER

Sarah Cavanaugh ("Respondent") is an Independent Social Worker pursuant to R. I. Gen. Laws §§ 5-39.1 *et seq.* and holds license number ISW03048 (the "License"). Respondent wishes to voluntarily surrender the License, reserving the right to petition for reinstatement pending resolution of the ongoing legal matters set forth below.

FINDINGS OF FACT

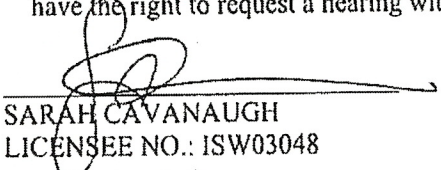
1. That Respondent is an Independent Social Worker licensed to practice in the State of Rhode Island under the License.
2. That Respondent has been licensed to practice as an Independent Social Worker in Rhode Island since November 15, 2019.
3. That Respondent graduated from Boston College on May 1, 2015.
4. That on or about March 14, 2022 the Rhode Island Department of Health ("RIDOH") received notice that Respondent was charged in Federal Court, with, among other charges, wire fraud, aggravated identity theft, use of [a] forged military discharge certificate, and fraudulent use of military medals.
5. That Respondent admits to the jurisdiction of RIDOH and hereby agrees to remain under the jurisdiction of RIDOH.
6. That Respondent has read and comprehended the Consent Order, and understands that this Consent Order shall be subject to final approval of RIDOH and is not binding on Respondent until final ratification by RIDOH.

7. If approved by RIDOH, Respondent hereby acknowledges and waives, relative only to this Consent Order:
- a) The right to appear personally or by counsel, or both, before RIDOH;
  - b) The right to produce witnesses and evidence on her behalf at a hearing;
  - c) The right to cross-examine witnesses presented by RIDOH;
  - d) The right to have subpoenas issued by RIDOH;
  - e) The right to further procedural steps except for those specifically contained herein;
  - f) Any and all rights of appeal of this Consent Order; and
  - g) Any objection that this Consent Order will (i) be reported to the National Practitioner Data Bank, (ii) be posted on the RIDOH's public website, or (iii) become a permanent part of Respondent's record and a part of the public record of this proceeding.

**ACCORDINGLY, AND BASED ON THE FOREGOING**

RIDOH and Respondent hereby agree to the following:

- 8. Respondent shall voluntarily surrender the License, reserving the right to petition for reinstatement, pending resolution of the legal matters set forth above, without making any admissions and without prejudice to the ability to defend any action brought based on the above allegations.
- 9. Respondent shall immediately cease and desist from representing herself as a licensed Independent Social Worker in the State of Rhode Island, nor engage in the practice of social work in any form, pending further Order of RIDOH.
- 10. If Respondent violates any term of this Consent Order, RIDOH shall have the discretion to impose disciplinary action, including immediate suspension of the License. If RIDOH imposes further disciplinary action, Respondent shall be given notice of such action and shall have the right to request a hearing within twenty (20) days of such discipline.

  
SARAH CAVANAUGH  
LICENSEE NO.: ISW03048

  
BRUCE D. TODESCO, CHIEF, CENTER FOR  
PROFESSIONAL BOARDS AND LICENSING

Date Signed:

7/27/2022

Date Signed:

7-28-2022